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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(OAKLAND DIVISION)

MEIJER, INC. & MEIJER
DISTRIBUTION, INC., on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

ABBOTT LABORATORIES,

Defendant.

ROCHESTER DRUG CO-
OPERATIVE, INC., on behalf of itself
and all others similarly situated,

Plaintiff,

v.

ABBOTT LABORATORIES,

Defendant.

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Case No. C 07-5985 CW

**DIRECT PURCHASER CLASS PLAINTIFFS'
NOTICE OF MOTION AND MOTION FOR
ENTRY OF PROPOSED PRETRIAL ORDER
NO. 1 (UNOPPOSED)**

Date: July 24, 2008

Time: 2:00 PM

Court: Courtroom 2, 4th Floor

Case No. C 07-6010 CW

Hon. Claudia Wilken

LOUISIANA WHOLESALE DRUG
COMPANY, INC., on behalf of itself
and all others similarly situated,

Plaintiff,

v.

ABBOTT LABORATORIES,

Defendant.

Case No. C 07-6118 CW

Hon. Claudia Wilken

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

Pursuant to Rule 23(g) of the Federal Rules of Civil Procedure and the *Manual on Complex Litigation (Fourth)*, and for the reasons set forth in the accompanying Memorandum of Law, plaintiffs in the three above-captioned antitrust class actions (collectively, "Plaintiffs") respectfully move for entry of the proposed Pretrial Order No. 1, attached to as Exhibit 1 to the supporting Memorandum of Law. PTO No. 1 would consolidate the three pending related class actions, and appoint interim co-lead class counsel.

Counsel for Plaintiffs have met and conferred with counsel for the Defendant, and all parties support entry of proposed Pretrial Order No. 1.

Dated: June 6, 2008

Respectfully submitted,

/s/ Eric Cramer

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20 Pursuant to General Order 45, Part X-B, the filer attests that concurrence in
21 the filing of this document has been obtained from Eric Cramer.
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